

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

<b>In Re:</b>	:	
	:	<b>: Chapter 13</b>
<b>Rhonda M. Stratton</b>	:	<b>: Case No. 18-12684-JKF</b>
	:	
<b>Debtor,</b>	:	
	:	
MTGLQ Investors, L.P.	:	
	:	
Movant,	:	
v.	:	Hearing: July 17, 2019 at 9:30 a.m.
	:	Courtroom # 3
Rhonda M. Stratton	:	
	:	
Debtor,	:	
And	:	
Scott F. Waterman, Esquire	:	11 U.S.C. §362(d) and §1301
Trustee,	:	
	:	
Respondents.	:	
	:	

**NOTICE OF AMENDED MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

MTGLQ Investors, L.P., has filed an amended motion for relief from automatic stay under §362(d) and §1301 co-debtor stay with the court to permit Movant to pursue its rights in the property described below to the extent and in the manner provided by any applicable contract documents and non-bankruptcy law.

*3308 Haverford Avenue, Philadelphia, PA 19104*

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

1) If you do not want the Court to grant Movant relief from the automatic stay and co-debtor stay regarding the above property, or if you want the court to consider your views on the amended motion, then on or before, July 11, 2019, you or your attorney must do all of the following:

a) File with the Court a written response to Movant's amended motion explaining your position. Your response must be filed with the Bankruptcy Clerk, at the United States Bankruptcy Court:

United States Bankruptcy Court  
Eastern District of Pennsylvania  
Bankruptcy Clerk of Courts  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive it** on or before the date stated above:

b) You must also mail a copy to:

Brian E. Caine, Esquire  
PARKER, McCAY, P.A.  
9000 Midlantic Drive, Ste 300  
P.O. Box 5054  
Mt. Laurel, NJ 08054  
*Attorney for Movant*

Scott F. Waterman, Esquire  
Chapter 13 Trustee  
2901 St. Lawrence Ave  
Suite 100  
Reading, PA 19606  
*Chapter 13 Trustee*

2) If you or your attorney do not take the steps described in Paragraph 1(a) and Paragraph 1(b) and attend the hearing, the Court may decide that you do not oppose the relief sought in the amended motion and may enter an order granting the relief requested in the motion.

3) A hearing on the amended motion is scheduled to be held before the Honorable Judge Jean K. FitzSimon, on July 17, 2019, at 9:30 a.m. in United States

Bankruptcy Court, Eastern District of Pennsylvania, Bankruptcy Clerk of Courts, 900 Market Street, Suite 400, Courtroom #3, Philadelphia, PA 19107.

4) If a copy of the amended motion is not enclosed, a copy of the amended motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5) You may contact the Bankruptcy Clerk's Office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: June 27, 2019

By: /s/ Brian E. Caine  
**BRIAN E. CAINE, ESQ.**  
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